

### III. REMARKS

Claims 1-26 are pending in this application. By this amendment, claims 1, 9, 11, 12 and 20 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-26 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Moser *et al.* (U.S. Patent No. 6,275,789), hereafter "Moser." Applicants respectfully traverse the rejection.

Initially, Applicants thank the Examiner for the telephone interview of November 10, 2005, with their representative, Hunter E. Webb. A proposed amendment was submitted in advance of the interview. In the interview, the Examiner indicated that she appreciated the differences between the claims as amended by Applicants and the cited reference. For example, Moser does not disclose, *inter alia*, "...translating selected text directly between the source language and the destination language." Claim 1 and similarly in claims 9, 14, 18 and 26. Additionally, Applicants' representative discussed other features of the claimed invention that Applicants assert are not disclosed by Moser, including that features argued below. The Examiner indicated a need for further search.

With regard to the 35 U.S.C. §102(e) rejection over Moser, Applicants assert that Moser does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 9, 12 and 20, Applicants submit that Moser fails to teach translating

selected text directly between the source language and the destination language. Instead, Moser teaches translation by generating an intermediate version in a linked alternative language (LAL). Col. 5, lines 13-34. To this extent, the translation of Moser is to an intermediate language and, as such, is not a true translation from a user specified source language (such as Chinese) directly to a user specified destination language (such as English). In contrast, the present invention includes "...translating selected text directly between the source language and the destination language." Claim 1. As such, the translating of the claimed invention is not merely to an intermediate language such as the LAL in Moser, but is instead directly between the designated source language and the designated destination language. Thus, the translating of claimed invention is not taught by the translation of Moser. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 1, 9, 12 and 20, Applicants respectfully submit that Moser also fails to teach that the translating is based upon the language dictionary. The Office equates the language dictionary of the claimed invention with a passage of Moser that teaches "...a standard bilingual-dictionary on the usages of the word or phrase in the source language and in any of a plurality of other natural languages or emulations thereof." Col. 31, line 66 through col. 32, line 2. However, Moser never teaches that its translating is based upon this standard bilingual-dictionary. In fact, the translating of Moser could not be based upon the standard bilingual-dictionary because Moser does not translate the source language into the other natural language, but instead into the LAL. The claimed invention, in contrast, includes "...a translation system for translating selected text directly between the source language and the destination language *based upon* the language dictionary." Claim 1, emphasis added. As such,

in contrast to Moser, the translating of the claimed invention is based upon the language dictionary. For the above reasons, Moser does not teach translating selected text based upon the language dictionary as included in the claimed invention. Accordingly, Applicants request that the rejection be withdrawn.

With still further respect to independent claim 9 and with respect to dependent claims 6, 14 and 23, Applicants respectfully submit that Moser also fails to teach a dictionary system for retrieving a language dictionary corresponding to the designated source language and destination language from a remote source. As stated above, the Office equates the language dictionary of the claimed invention with a standard bilingual-dictionary entry in Moser. Col. 31, line 66 through col. 32, line 3. The Office then cites a passage of Moser that teaches, "...LAL technology might also be utilized to formulate and implement a more neutral and carefully standardized form of the contemporary English language for worldwide use on the Internet." Col. 5, line 64 through col. 6., line 1. However, the passage of Moser cited by the Office teaches that the LAL may be used to display items on the Internet, and not that the standard bilingual-dictionary entry is retrieved from the Internet. Nowhere in the passage cited by the Office or elsewhere does Moser teach that the standard bilingual-dictionary entry is retrieved from a remote location. In contrast, the claimed invention includes "...a dictionary system for retrieving a language dictionary corresponding to the designated source language and destination language from a remote source." Claim 9. As such, the language dictionary and remote source of the claimed invention are not unrelated as are the standard bilingual-dictionary entry and Internet in Moser, but rather the language dictionary is retrieved from the remote source. For the above

reasons, the standard bilingual-dictionary entry does not teach the language dictionary of the claimed invention. Accordingly, Applicants request that the rejection be withdrawn.

With respect to dependent claim 11, Applicants respectfully submit that Moser fails to teach that the update system periodically updates the language dictionary based on a user designated language schedule. In contrast, the Office states that Moser teaches that the source language may be written English, reflecting the spoken and written English of the U.S. between 1980 and 1999. Office Action, page 7. However, this statement indicates the character of the source language (SL) that is input into the Moser system and not an update for a dictionary used to translate the source language. Furthermore, the statement of the Office does not show that the source language is periodically updated based on a user designated language schedule. In contrast, the claimed invention includes "...wherein the update system periodically updates the language dictionary based on a user designated language schedule." Claim 11. As such, the update system of the claimed invention does not merely indicate the character of the source language (SL) input as indicated by the Office, but instead periodically updates the language dictionary based on a user designated language schedule. Thus, the update system of the claimed invention is not taught by the indication of the character of the source language input in the Office's interpretation of Moser. Accordingly, Applicants respectfully request that the rejection of the Office be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features.

Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully requests withdrawal of this rejection.

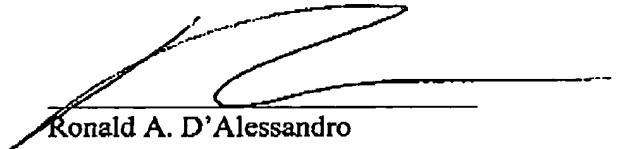
#### IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. These features have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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